

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
vs.)	Civil Action No.: 1:16-cv-563
)	
WAPLES MOBILE HOME PARK LIMITED)	
PARTNERSHIP, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	

**PLAINTIFF JOSE DAGOBERTO REYES' RESPONSES
TO DEFENDANTS' REQUESTS FOR ADMISSION**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court, and subject to the objections previously propounded, plaintiff Jose Dagoberto Reyes responds to defendants' Requests for Admission as follows:

Request for Admission No. 1

Admit that you were able to comply with the Policy.

Response to Request for Admission No. 1

Denied. The policy requires all adult residents to supply certain documents. Because my wife (an adult who necessarily resides with me) could not provide all of these documents, I was unable to comply with the Policy.

Request for Admission No. 2

Admit that you were able to comply with the Policy because you are in the United States legally.

Response to Request for Admission No. 2

Denied for the same reason stated in RFA #1.

Request for Admission No. 3

Admit that you were able to enter into Rental Agreements to rent a Lot at the Park..

Response to Request for Admission No. 3

Admitted.

Request for Admission No. 4

Admit that you were never denied the right to enter into a Rental Agreement for a Lot at the Park because you are Latino.

Response to Request for Admission No. 4

Denied. The policy requires all adult residents to supply certain arbitrary and unnecessary documents. Because this policy has a disparate impact on Latinos, and my wife (an adult who necessarily resides with me) who could not provide all of these documents is Latina, I was unable to enter into an agreement to renew my lease.

Request for Admission No. 5

Admit that you were never denied the right to enter into a Rental Agreement for a Lot at the Park because you are not a citizen of the United States.

Response to Request for Admission No. 5

Denied, for the same reason stated in RFA #4.

Request for Admission No. 6

Admit that the only reason you cannot enter into a Rental Agreement now is because your wife cannot produce documentation that she has legally entered the United States.

Response to Request for Admission No. 6

Denied. The only reason I cannot enter into a rental agreement is that the landlord is imposing an arbitrary and unnecessary documentation requirement on my wife, which documentation requirement is not a proxy or indicator for "has legally entered the United States."

Request for Admission No. 7

Admit that your wife cannot comply with the Policy because she cannot acquire the documents required by the Policy.

Response to Request for Admission No. 7

Admitted.

Request for Admission No. 8

Admit that your wife does not possess an original Passport.

Response to Request for Admission No. 8

Denied.

Request for Admission No. 9

Admit that your wife does not possess an original U.S. Visa.

Response to Request for Admission No. 9

Admitted.

Request for Admission No. 10

Admit that your wife does not have Customs and Border Protection Form I-94.

Response to Request for Admission No. 10

Admitted.

Request for Admission No. 11

Admit that your wife cannot acquire or access a Customs and Border Protection Form I-94.

Response to Request for Admission No. 11

Admitted.

Request for Admission No. 12

Admit that you have entered the United States legally.

Response to Request for Admission No. 12

Please see previously stated objection.\

Request for Admission No. 13

Admit that you have entered the United States legally.

Response to Request for Admission No. 13

Please see previously stated objection.

Request for Admission No. 14

Admit that your wife is not able to show any form of valid government-issued proof that she is legally present in the United States.

Response to Request for Admission No. 14

Admitted.

Request for Admission No. 15

Admit that your wife is not able to acquire any form of valid government-issued proof that she is legally present in the United States.

Response to Request for Admission No. 15

Denied. Although my wife does not presently possess any such documentation, the question of whether she would be ever able to obtain any such documentation requires a full analysis of any possible immigration relief that might be presently available to her (or might in the near future become available to her), which is a possibility that I do not believe to be foreclosed.

Request for Admission No. 16

Admit that your wife cannot comply with the Policy because she is in the United States illegally.

Response to Request for Admission No. 16

Denied. The policy requires all adult residents to supply certain arbitrary and unnecessary documents, the absence of which is not a proxy or indicator for "in the United States illegally." Because my wife could not provide all of these documents, she was unable to comply with the Policy.

Request for Admission No. 17

Admit that you have an ITIN.

Response to Request for Admission No. 17

Denied.

Request for Admission No. 18

Admit that your wife has an ITIN.

Response to Request for Admission No. 18

Admitted.

Request for Admission No. 19

Admit that other non-U.S. citizens have entered into leases at the Park in 2015.

Response to Request for Admission No. 19

Admitted.

Request for Admission No. 20

Admit that other non-U.S. citizens have entered into leases at the Park in 2016.

Response to Request for Admission No. 20

Admitted.

Request for Admission No. 21

Admit that other Latinos have entered into leases at the park in 2015.

Response to Request for Admission No. 21

Admitted.

Request for Admission No. 22

Admit that other Latinos have entered into leases at the park in 2016.

Response to Request for Admission No. 22

Admitted.

Request for Admission No. 23

Admit that other non-U.S. citizens who are Latino have entered into leases at the Park in 2015.

Response to Request for Admission No. 23

Admitted.

Request for Admission No. 24

Admit that other non-U.S. citizens who are Latino have entered into leases at the Park in 2016.

Response to Request for Admission No. 24

Admitted.

Request for Admission No. 25

Admit that you have had individuals over the age of eighteen who are not listed on a lease or Rental Agreement with Defendants reside in your Mobile Home at the Park while you lived at the Park.

Response to Request for Admission No. 25

Admitted.

Respectfully submitted,

JOSE DAGOBERTO REYES,

By  counsel

Date: October 7, 2016

Simon Y. Sandoval-Moshenberg (VSB No. 77110)
Rebecca Wolozin (VSB No. 89690)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike #520
Falls Church, VA 22041
(703) 720-5605 / fax (703) 778-3454
simon@justice4all.org
becky@justice4all.org

Paul Brinkman (VSB No. 35950)
Jeanhee Hong (*pro hac vice*)
Ariel Wade Trajtenberg (*pro hac vice*)
Diego Durán de la Vega (*pro hac vice*)
Jongwook Kim (*pro hac vice*)
William A. Margeson (*pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001-3706
(202) 538-8000 / fax: (202) 538-8100
paulbrinkman@quinnemanuel.com
jeanheehong@quinnemanuel.com
arieltrajtenberg@quinnemanuel.com
diegoduran@quinnemanuel.com
wookiekim@quinnemanuel.com
billmargeson@quinnemanuel.com

CERTIFICATE OF SERVICE

I hereby certify that on the 7th of October, 2016, I served the foregoing document by first-class U.S. mail and e-mail upon the following parties:

Michael S. Dingman, VSB #30031
REED SMITH LLP
7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
mdingman@reedsmith.com
Counsel for Defendants

_____/s/_____
Simon Y. Sandoval-Moshenberg (VSB No. 77110)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike #520
Falls Church, VA 22041
(703) 720-5605 / fax (703) 778-3454
simon@justice4all.org

Date: October 7, 2016

